



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Suite 6010 Lee Park  
555 North Lane  
Conshohocken, PA 19428  
September 9, 1994

(610) 832-6212  
Fax: (610) 832-6259

**Southeast Regional Office**

Russel G. Levering, plant engineer  
Damascus-Bishop Tube Company, Inc.  
P.O. Box 1189  
Frazer, PA 19355

Re: Small Quantity Generator Inspection  
September 8, 1994  
Damascus-Bishop Tube Co., Inc.  
PAD 081868309  
East Whiteland Twp.  
Chester County

**NOTICE OF VIOLATION**

Dear Mr. Levering:

This letter is to confirm the findings of the Department's referenced inspection of your hazardous waste activities. Requirements for the handling of waste materials are contained in the **Solid Waste Management Act, Act of 1980, P.L. 380, No. 97, as amended, (SWMA)**, and the **Clean Streams Law, Act of 1937, P.L. 1987, No. 394, as amended, (CSL)**, and **Title 25, Chapters 101 and 271-299 of the Rules and Regulations** of the Department. Violations of the above found during the referenced investigation are as follows:

**§§261.5(g)(1) and §§262.11 of the Rules and Regulations**

A hazardous waste determination was not available at the time of the inspection. This determination should be performed on all waste streams in accordance with the above referenced sections of the Hazardous Waste Regulations.

You are hereby notified of both the existence of these violations as well as the need to provide for their prompt correction. Toward this end, you are requested to submit to the Department within fourteen (14) days a proposed program and schedule for the abatement of these violations.

This letter does not waive, either expressly or by implications, the power or authority of the Commonwealth of Pennsylvania to prosecute for

September 9, 1994

any and all violations of law arising prior to or after the issuance of this letter or the conditions upon which the letter is based. This letter shall not be construed so as to waive or impair any rights of the Department of Environmental Resources, heretofore or hereafter existing

This letter shall also not be construed as a final action of the Department of Environmental Resources.

If you have any questions concerning this matter, please feel free to contact me at (610) 832-6182.

Sincerely,



Thomas R. Storrer  
Waste Management Specialist  
Waste Management Program

ENCLOSURE:

cc: Regional  
Compliance  
File  
C.O.

## HAZARDOUS WASTE INSPECTION REPORT TSD FACILITIES - PART A

Date of Inspection 9/8/94 Time start 11:00 am Time finish 12:30 pm  
Name of Inspector THOMAS STORRER  
Company, installation name DAMASCUS-BISHOP TIRE COMPANY  
Location P.O. Box 1184, Rt 70 & MILLIN R. FRAZER PA 19355  
County CHESTER Municipality F. WETTELAND TWP.  
Identification number PAD 081868309  
Name of responsible official RUSSEL G. LEVERING  
Title PLANT ENGINEER  
Mailing Address Same  
Area code and telephone number (610) 647-3450  
Name of person interviewed Same  
Title \_\_\_\_\_  
Mailing address (if different from above) \_\_\_\_\_  
Area code and telephone number \_\_\_\_\_

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments ☐ chemical ☐ physical ☐ biological  
b. ☐ Storage - ☐ containers ☐ tanks ☐ surface impoundments ☐ waste piles  
c. ☐ Disposal - ☐ land treatment ☐ landfill ☐ incineration ☐ thermal treatment  
d. ☐ Use ☐ reuse ☐ recycle ☐ reclaim

2. Does the facility generate hazardous waste? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

SPENT OILS / EMULSIFIED LIQUID  
SPENT SOLVENTS  
GRINDING DUST

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

~~NOT A TSD~~

## INSPECTION REPORT - HAZARDOUS WASTE SMALL QUANTITY GENERATOR

Site I.D. PAD 081868309

Telephone # (610) 647-3450

Site Name DAMASCUS BISHOP TUBE COMPANY

Operator Name DA

Address \_\_\_\_\_

Address P.O. Box 1189, Rt 30 & Millen  
FRAZER PA 19355

Municipality E. WHITELAND TWP.

County CHESTER

Responsible Official RUSSAL G. LEVERING

Title \_\_\_\_\_

Person Interviewed Same

Title \_\_\_\_\_

Inspector THOMAS STORRER

Time \_\_\_\_\_

Due Date

Inspection Date

Inspection Type

Facility Type

Inspector ID

# Violation

9/8/94

9/8/94

2152

01

Are hazardous wastes transported off-site by this generator? ☐ Yes ☒ No

If not, license number(s) and expiration dates of transporter(s): PA

1-No Violation Observed    2-Not-Applicable    3-Not-Determined    4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Amount of wastes generated per month is within small quantity generator limits	261.5(a)	H130
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Amount of waste accumulated is within small quantity generator limits	261.5(d)	H131
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hazardous waste determination (262.11)	261.5(g)(1)	H132
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Records of quantities, descriptions and dispositions of all wastes retained for five years and furnished to the Department upon request	262.11(d)	H133
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage within time limit specified (261.5(d))	261.5(g)(2)	H134
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifest system used for off-site transport	262.20(a)	H135

261.5 Indicate below the method of handling of the waste:

- ☐ a. Treatment or disposal at permitted on-site facility.  
Permit Number \_\_\_\_\_ Treatment \_\_\_\_\_ Disposal \_\_\_\_\_
- ☐ b. Delivered to a PA haz. waste facility. Name of facility: \_\_\_\_\_
- ☐ c. Delivered to a PA municipal or residual facility with Form S approval. Name of facility: \_\_\_\_\_
- ☒ d. Delivered to an approved out-of-state facility. Name of facility: LYLE CHEM INC.  
217 SOUTH FIRST ST. ELIZABETH NJ 07206 (908) 355-5800
- ☐ e. Delivered to a reclamation, reuse, or recycle facility. Name of facility: \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection September 8, 1994 Identification Number PAD081868309

Company/Facility/Site Name Damascus-Bishop Tube Company, Inc.

A routine hazardous waste generator inspection was conducted with Russel G. Levering, plant engineer, present. Since the company no long produces hazardous waste in the amount of a large quantity generator (LQG), a small quantity generator (SQG) inspection was conducted instead. Mr. Levering was provided with the proper EPA Notification Forms and briefly explained on how to make the necessary changes.

A copy of the PPC plan was provided and Mr. Levering explained the hazardous waste and non-hazardous waste generated. It should be noted there was no hazardous waste determination available. According to Mr. Levering the only hazardous waste generated is a mix of hydrochloric acid and hydrogen peroxide produced by the edging process in the amount of one drum per year.

This drum is stored in the northwest corner of plant 8. During the inspection the drum bung was open with a funnel in the opening. The drum should remain closed when not disposing of waste. Since Damascus-Bishop is notifying as a small quantity generator, no secondary containment is required in the storage area.

Other waste produced are spent oils (emulsifying fluid), spent solvents, and grinding dust. Spent oils are generated in quantities of 32 drums per year. Spent solvents are generated in quantities of 16-18 gallons per month. The grinding dust which is generated from the polishing process is approximately 13 drums per year. Since there was no hazardous waste determination, there was no way to classify these waste streams. Mr. Levering said analysis will be obtained from Gemini Disposal Services, Inc. on the grinding dust and the spent oils (emulsifying fluid) and the MSDS sheets on the hydrochloric acid and hydrogen peroxide will be obtained for the hazardous waste determination.

The bill of lading (9/6/94, 1760 gallons by M & M Oils Services, Inc., Warminster, PA) was produced for the spent oils (emulsifying fluid). A bill of lading is sufficient as long as the waste determination indicates the spent oil is not hazardous.

The Armco building located east of plant 5 is where the spent oils are stored. The building has a 4" berm from previous storage of K062 and HNO<sub>3</sub> in tanks, and it has a concrete floor. Grinding dust is stored in a drum at a central location in the plant.

Two areas that need to be clarified are the type and ownership of transformers located on the property and a description and quantity of waste generated by the metallurgical lab if or when it is operating.

Damascus-bishop Tube Company, Inc. should also maintain records of residual waste generated as required by Residual Waste Regulations Chapter 287, subchapter B, §§287.51-54 for generators over 2,200 pounds, or §§287.55 for generators under 2,200 pounds.

No other observations were made.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) \_\_\_\_\_ Date \_\_\_\_\_

Inspector (signature) *M. J. H.* Date 9/9/94

Page \_\_\_\_ of \_\_\_\_

## EVALUATION - VIOLATION - ENFORCEMENT FORM

Form V2.0

Handler ID Number		Handler Type	
P: A: D: 0: 8: 1: 8: 6: 8: 3: 0: 9		LDF [ ] TSF [ ] INC [ ] LQG [ ] SQG [ ] CEG [ ] TRA [ ]	
Handler Name		Contact Name	Date Submitted
(Damascus)-BISHOP TUBE CO.		RUSSEL LEVERING	0:9:0:9:9:4
Street		City	
RT 30 & MILLER RD		FRAZER PA 19355	

EVALUATION	Add <input checked="" type="checkbox"/>	Change	Delete
Date	Number	Agency	Type
0:9:0:8:9:4		S	C: E: F
Reason	Branch	Person	
		P.A.T.R.S.	

AREAS OF EVALUATION ( E - Evaluated NE - Not Evaluated NA - Not Applicable )

GER	GPT	GBF	TWD	DGS	DLT	DPB	DWP
GGR	GRR	TGR	DCH	DGW	DMC	DPP	DBF
GLB	GSC	TMR	DCL	DIN	DMR	DSI	CAS
GMR	GSQ	TOR	DCP	DLB	DOR	DTR	FEA
GOR	GEX	TRR	DFR	DLF	DOT	DTT	CSS

Comments NO LONGER LARGE QUANTITY GEN.; ONLY SMALL QUANTITY.

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

Agency	Number	Area	Date Determined	Agency	Number	Area	Date Determined

VIOLATION Add ☒ Change Delete Link to Above Evaluation? (Y/N) Y

Agency	Number	Area	Class	Regulation Type	Regulation Citation
S		G: G: R	I	SR	261.5(g)(1), 262.11
Date Determined	Priority	Branch	Person	Scheduled	Returned to Compliance Actual
0:9:0:8:9:4			P.A.T.R.S.		

Comments No hazardous waste determination

VIOLATION Add Change Delete Link to Above Evaluation? (Y/N)

Agency	Number	Area	Class	Regulation Type	Regulation Citation
Date Determined	Priority	Branch	Person	Scheduled	Returned to Compliance Actual

Comments

☐ Required ☐ Required if pertinent ☐ Required only for previously reported data ☐ Not Required by EPA

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection January 31, 1996 Identification Number PAD 081868309Company/Facility/Site Name Damascus-Bishop Tube Company, Inc.

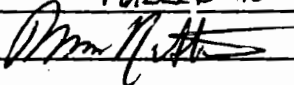
8. Records should be maintained which clearly indicate the amounts of each waste stream, hazardous or residual, generated, transported, and disposed according to applicable regulations. The records are necessary to determine generator status (large or small quantity generator) and compliance with applicable regulations.

No other observations were made.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) MAILED TO FACILITY Date 2/13/96Inspector (signature)  Date 2/13/96

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection January 31, 1996 Identification Number PAD 081868309  
Company/Facility/Site Name Damascus-Bishop Tube Company, Inc.

A routine Large Quantity Generator (LQG), TSD facilities, Hazardous Waste Transportor, and Residual Waste Generator inspections were conducted with David Lewis, Operations Manager/Assistant Plant Manager present. Damascus-Bishop Tube manufactures stainless steel tubing from rolled steel.

The following observation were made.

1. Bishop Tube, Inc. is listed in the EPA Notification database as generator for this EPA Identification number. Bishop Tube is not the current leasee and operator of the facility. Damascus-Bishop Tube is the current leasee and operator. The property is still owned by Christiana Metals Corporation, according Mr. Lewis. The change of generator name and contact name should be made on the EPA notification form provided during the inspection.
- ☐ 2. This facility is listed as a TSD facility in the EPA notification database. Damascus-Bishop Tube does not operate a TSD facility at this location.
3. This facility is listed as a hazardous waste transporter. Damascus-Bishop Tube is not licensed by the Commonwealth and does not transport hazardous waste.
4. The previous leasee to Damascus-Bishop abandoned numerous drums of unknown contents onsite in a corrugated metal building behind the main facility. Damascus-Bishop has characterized and disposed of the waste accordingly. Some of the waste was hazardous which has increased the amount of hazardous waste generated in recent quarters.
5. Damascus Bishop generates approximately one drum of D002, waste corrosive liquid, approximately every ninety plus days under normal plant operations, according to Mr. Lewis. This quantity of hazardous waste is within the Small Quantity Generator (SQG) limits under 1000 kg/ month. Damascus-Bishop should make the change on the EPA notification form and managed the waste according to applicable regulations.
- ☐ 6. Damascus-Bishop tube generates waste emulsified fluid used to cool the steel through the rollers. Analysis provided indicate the emulsified fluid is a residual waste and is disposed of by M & M Oil Service. The amount of the waste generated per month is not determine.
7. Damascus-Bishop generates grindings and shavings, a residual waste.
8. Damascus Bishop generates scrap metal which is sold for scrap.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violation identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or im immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the pers was shown the report or that a copy was left with the person.

Person interviewed (signature) \_\_\_\_\_ Date \_\_\_\_\_

Inspector (signature) \_\_\_\_\_ Date \_\_\_\_\_



Generator Name DAMASCUS-BROWN TUBE  
Date 1/31/96

## INSPECTION REPORT - RESIDUAL WASTE GENERATOR

1 = No Violation Observed		2 = Not Applicable		3 = Not Determined		4 = Non-Compliance	
Chapter Citation	Requirement	Status				Line Number	
25 Pa Code	GENERAL PROVISIONS	1	2	3	4		
287.6	Designated facility: valid permit? Permit Number (PA) _____		✓			3001	
287.52(a)	Biennial report submitted by March 1 of each odd numbered year.			✓		3002	
287.53	Written source reduction strategy on file and in effect.			✓		3003	
287.53(b)	Waste reduction strategy covers all waste streams.			✓		3004	
287.53(c)	Reduction strategy updated every five years or when waste or manufacturing process changes.			✓		3005	
287.54	Waste analysis performed: copy on file.	✓				3006	
287.54(b, f)	Annual analysis or certification of waste submitted to Department and designated facility.			✓		3007	
287.55	Small quantity generator record keeping requirements.			✓		3008	
287.101(a)	Operation of disposal or processing facility without a permit.	✓				3009	
	STORAGE REQUIREMENTS						
299.111(1)	Residual waste not mixed with hazardous waste.	✓				3010	
299.111(2)	Waste stored as not to create a safety risk.	✓				3011	
299.111(3)	Residual waste not mixed with special handling waste.	✓				3012	
299.111(4)	Waste not blown or otherwise deposited outside storage area.	✓				3013	
299.112(c)	Storage area inspected; records available.			✓		3014	
299.113(a)	All waste stored less than one year.	✓				3015	
299.114(a)	Equipment maintained in operable condition.	✓				3016	
299.114(c)	Equipment cleaning frequencies maintained.	✓				3017	
299.115	Vectors controlled and public nuisances prevented.	✓				3018	
299.116(a)(b)	Run on, runoff minimized; storage areas managed in accordance with Clean Streams Law.	✓				3019	
299.116(c)	Waste stored to prevent groundwater degradation.	✓				3020	
299.121	Sufficient number of properly constructed storage containers.	✓				3021	
299.122	Storage tank design standards.	✓				3022	
299.112(d), 299.131(b)	No putrescible waste or liquid waste stored in piles.					3023	
299.131	Waste storage pile area properly designed, constructed and maintained.		✓			3024	
299.132	Storage pad or liner system properly designed and maintained.		✓			3025	
299.133	Proper design and maintenance of leachate and runoff control systems.		✓			3026	
299.151	Proper storage and containment of incinerator ash residue.					3027	
299.152	Proper storage and containment of friable asbestos containing waste.		✓			3028	
299.153	Proper storage and containment of coal ash.		✓			3029	
299.154	Proper storage and containment of PCB containing waste material.		✓			3030	



## INSPECTION REPORT - HAZARDOUS WASTE SMALL QUANTITY GENERATOR

Site I.D. PAD 081868309 Telephone # (610) 647-3450  
Site Name DAMASCUS-BISHOP TUBE COMPANY INC. Operator Name DAMASCUS-BISHOP TUBE (ame  
Address Rt 30 & MATH RD Address P.O. Box 1189  
FRAZER PA 19355 FRAZER PA 19355  
Municipality E. WHITELAND County CHESTER  
Responsible Official GIANCLAUDIO CONTI Title ENGINEER/PLANT MGR  
Person Interviewed DAVID LEWIS Title OPR MGR/ASST PLANT MGR.  
Inspector THOMAS STORREER Time 9:30 AM  
Due Date 9/30/96 Inspection Date 1/31/96 Inspection Type 01 Facility Type 07 Inspector ID 2152 # Violation 0

Are hazardous wastes transported off-site by this generator? Yes ☒ No

If not, license number(s) and expiration dates of transporter(s): PA-AH 0420 9/30/96, PA-AH 0299

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE NUMBERS
1	2	3	4			
<input checked="" type="checkbox"/>				Amount of wastes generated per month is within small quantity generator limits. Average waste generated monthly <u>~440 lbs</u>	261.5(a)	H491
<input checked="" type="checkbox"/>				Amount of waste accumulated is within small quantity generator limits	261.5(d)	H492
<input checked="" type="checkbox"/>				Hazardous waste determination (262.11)	261.5(g)(1)	H493
<input checked="" type="checkbox"/>				Records of quantities, descriptions and dispositions of all wastes retained for five years and furnished to the Department upon request.	262.11(d)	H494
<input checked="" type="checkbox"/>				Storage within time limit specified (261.5(d))	261.5(g)(2)	H495
<input checked="" type="checkbox"/>				Manifest system used for off-site transport	262.20(a)	H496

261.5 Indicate below the method of handling of the waste:

- ☐ a. Treatment or disposal at permitted on-site facility.  
Permit Number \_\_\_\_\_ Treatment \_\_\_\_\_ Disposal \_\_\_\_\_
- ☐ b. Delivered to a PA haz. waste facility. Name of facility: \_\_\_\_\_
- ☐ c. Delivered to a PA municipal or residual facility with Form S approval. Name of facility: \_\_\_\_\_
- ☒ d. Delivered to an approved out-of-state facility. Name of facility: CYCLE CHEM  
NJD002200046
- ☐ e. Delivered to a reclamation, reuse, or recycle facility. Name of facility: \_\_\_\_\_

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT  
TSD FACILITIES - PART A

Date of Inspection 01/31/96 Time start 9:30 am Time finish 12:15 pm.  
Name of Inspector THOMAS STORER  
Company, installation name DAMASCUS BISHOP TUBE COMPANY, INC.  
Location Rt 30 & MILLER RD FRAZER PA 19355  
County CUKSTER Municipality EAST WHITELAND  
Identification number (PAD 081868309)  
Name of responsible official GIANCLAUDIO CONTI  
Title ENGINEER / PLANT MANAGER  
Mailing Address SAME  
Area code and telephone number (610) 647-3450  
Name of person interviewed DAVID LEWIS  
Title OPR MGR / ASST PLANT MGR  
Mailing address (if different from above) \_\_\_\_\_  
Area code and telephone number \_\_\_\_\_

1. Site characterization: NOT A TSD FACILITY
- |   |   |                                   |   |  |
|---|---|-----------------------------------|---|--|
| a. <input type="checkbox"/> Treatment - | <input type="checkbox"/> surface impoundments | <input type="checkbox"/> chemical | <input type="checkbox"/> physical             | <input type="checkbox"/> biological        |
| b. <input type="checkbox"/> Storage -   | <input type="checkbox"/> containers           | <input type="checkbox"/> tanks    | <input type="checkbox"/> surface impoundments | <input type="checkbox"/> waste piles       |
| c. <input type="checkbox"/> Disposal -  | <input type="checkbox"/> land treatment       | <input type="checkbox"/> landfill | <input type="checkbox"/> incineration         | <input type="checkbox"/> thermal treatment |
| d. <input type="checkbox"/> Use         | <input type="checkbox"/> reuse                | <input type="checkbox"/> recycle  | <input type="checkbox"/> reclaim              |  |
2. Does the facility generate hazardous waste? ☐ Yes ☐ No
3. Types of hazardous waste produced by Hazardous Waste Number:  
D002
4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT  
TSD FACILITIES - PART A

Date of Inspection 5/29/97 Time start 10:30 HRS Time finish 11:15 HRS  
Name of Inspector THOMAS STORRER  
Company, installation name DAMASCUS-BISHOP TUBE COMPANY (FORMERLY BISHOP TUBE CO)  
Location RT 30 & MAIN RD FRAZER PA 19355  
County CHESTER Municipality EAST WHITELAND  
Identification number PAD 081 868 309  
Name of responsible official KENT L. LULWICH  
Title PLANT MANAGER  
Mailing Address P.O. Box 1189, FRAZER PA 19355  
Area code and telephone number (610) 647-3450  
Name of person interviewed KENT L. LULWICH  
Title PLANT MANAGER  
Mailing address (if different from above) \_\_\_\_\_  
Area code and telephone number \_\_\_\_\_

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments ☐ chemical ☐ physical ☐ biological  
b. ☐ Storage - ☐ containers ☐ tanks ☐ surface impoundments ☐ waste piles  
c. ☐ Disposal - ☐ land treatment ☐ landfill ☐ incineration ☐ thermal treatment  
d. ☐ Use ☐ reuse ☐ recycle ☐ reclaim

2. Does the facility generate hazardous waste? ☐ Yes ☐ No ☒ NOT DETERMINED

3. Types of hazardous waste produced by Hazardous Waste Number:

4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

NOT A TSD FACILITY

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

## INSPECTION REPORT COMMENTS

Date of inspection 5/29/97 Identification Number PAD 081 868 309  
Company/Facility/Site Name Damascus-Bishop Tube Company

A routine inspection was conducted with Aris Grom, PADEP, and Kent L. Lulewich, Plant Manager, present. Damascus-Bishop Tube manufactures stainless steel tubes. The facility is currently listed as a TSD (Treatment, Storage and Disposal Facility), TRANS (hazardous waste transporter) and a LQG (Large Quantity Generator) in the 2/8/96 EPA Notification Report. The latest notification made to the EPA for hazardous waste activities was 8/18/80 by David Moleton.

The following observations were made.

1. Damascus-Bishop Tube is not currently operating as a TSD nor is the company a licensed hazardous waste transporter in Pennsylvania.
2. Damascus-Bishop generates three waste streams in the manufacture of the tubing:
  - a. spent polishing sand
  - b. spent aqueous based coolant
  - c. scrap metal
3. Mr. Lulewich did not have analysis available for the spent polishing sand. However, Mr. Lulewich did say the spent polishing sand currently onsite has been tested and the results are at the company's Greenville office. In accordance with §262.11(a), any person who generates a solid waste shall determine if the waste is hazardous waste. In accordance with §262.40(c), the evaluations shall be retained at location of generation for 20 years and be made available upon request. Therefore, the Department requests the spent sand polishing waste analysis be submitted to my attention at the address on the business card provided.
4. Damascus-Bishop Tube maintains a Safety-Kleen parts washer utilizing a non-hazardous solvent.
5. A clear liquid with an orange precipitate staining the ground was seeping through the cracks in the asphalt of the parking area near bay doors to the production floor. The seeps drained into a drainage basin below the bay doors which discharges to a waterway. It is requested Damascus-Bishop determine the cause and the nature of the seep and submit a written response describing the findings within thirty (30) days of this report.
6. Spent coolant is piped from the closed-loop coolant system to a plastic storage tank inside the facility. The frequency of coolant replacement was not known by Mr. Lulewich, who started as plant manager one month ago.
7. Scrap metal is stored in a rolloff container outside the bay doors.

It is recommended Damascus-Bishop Tube review the analysis for the spent polishing sand. Based on the results of the review Damascus-Bishop should manage the waste accordingly. After determining the status of the spent sand polishing waste, the facility should submit a subsequent notification of hazardous waste activities on the form provided describing the changes in generator status in section XI, Comments.

Any questions or comments may be directed to me at (610) 832-6182.

No other observations were made.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) MAILED TO FACILITY Date 5/30/97  
Inspector (signature) [Signature] Date 5/30/97